

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

**No. 1:15-cr-10256-RGS**

---

UNITED STATES OF AMERICA,  
Plaintiff

Vs.

JOSE PEREZ, JR.  
Defendant

---

**EX PARTE RESPONSE TO COURT ORDER REGARDING AGREED  
UPON MOTION TO RELEASE JOSE PEREZ, JR. FROM PRETRIAL  
DETENTION**

Jose Perez, Jr., by his attorney, files his Response to the Court's Order to produce the Defendant's medical and treatment records from the Plymouth County Sheriff's Department on or before April 21, 2020. This Response is in support of his motion, pursuant to 18 U.S.C. §3145(b), that this Court reconsider its prior order of detention and release Mr. Perez Jr. from confinement.

The Defendant submits the afore-described medical records and respectfully requests that the records sought by the Court's order be sealed.

Respectfully Submitted,  
Jose Perez, Jr.  
By his counsel,

Date: 04/20/2020

/s/ Vivianne Jeruchim  
Vivianne Jeruchim, Esq.  
BBO #547598

Jeruchim & Davenport, LLP  
50 Congress St., Suite 615  
Boston, MA 02109  
617/720-6047

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on April 20, 2020.

Date: 04/20/2020

/s/ Vivianne Jeruchim  
Vivianne Jeruchim, Esq.